## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:	Chapter 11
CIRCUIT CITY STORES, INC., et al.,	Case No.: 08-35653-KRH

Debtors.

## RESPONSE TO OBJECTION TO PROOF OF CLAIM NUMBERS 12386 AND 14468

NOW COMES The Columbus Dispatch ("Columbus") by counsel, and files its Response to the Debtor's Objection to Columbus's Proof of Claim numbers 12386 and 14468 in its Sixty-Seventh Omnibus Objection and states as follows:

- 1) Columbus provided advertising for the Debtor in its newspaper.
- 2) The Debtor failed to pay the balance due.
- 3) Attached is a copy of an invoice which evidences the balance owing of \$98,246.06.
- 4) The Debtor proposes that Columbus have a claim of only \$65,544.64.
- 5) The figure \$65,544.64 does not include payment for two pre-petition circulars in November 2008, which total \$32,701.42.
- 6) Proof of Claim number 14468 amends claim number 12386.
- 7) The balance owed Columbus is \$98,246.06 and the claim should be allowed in that amount.

Steven L. Brown, Esquire Wolcott Rivers Gates Counsel for The Columbus Dispatch Convergence Center IV 301 Bendix Road, Suite 500 Virginia Beach, VA 23452 VSB #23740

- 8) Notice Address:
  - c/o Steven L. Brown, Esquire Wolcott Rivers Gates Convergence Center IV 301 Bendix Road, Suite 500 Virginia Beach, VA 23452 Telephone no.: (757) 497-6633 Fax no.: (757) 497-7267
- 9) I hereby declare that I have personal knowledge of the relevant facts that support

this Response.

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WHEREFORE The Columbus Dispatch respectfully requests that this Court enter an Order to overrule the Debtor's Objection to Proof of Claim numbers 12386 and 14468 and for other relief as necessary.

Date: March 16, 2010

Steven L. Brown, Esquire Convergence Center IV 300 Bendix Road, Suite 500 Virginia Beach, VA 23452 (757) 497-6633

/s/ Steven L. Brown

Virginia State Bar No. 23740

Counsel for The Columbus Dispatch

## CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing was deposited in the United States mail, first class, postage prepaid, on this 16<sup>th</sup> day of March, 2010 and addressed to:

Skadden, Arps, Slate Meagher & Flom, LLP One Rodney Square P.O. Box 636 Wilmington, DE 19899-0636 Attn: Gregg M. Galardi

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/s/ Steven L, Brown